

# **EXHIBIT B**

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*Attorneys for Defendants,*  
Near North America, Inc., Near Intelligence LLC  
(successor entity of Near Intelligence Holdings, Inc.),  
and Near Intelligence, Inc.

BRIAN NASH,

Plaintiff,

v.

NEAR NORTH AMERICA, INC., NEAR  
INTELLIGENCE HOLDINGS, INC., NEAR  
INTELLIGENCE, INC., LAURENT  
CASTAILAC, GLADYS KONG and ANIL  
MATTEWS,

Defendants.

SUPERIOR COURT OF NEW JERSEY

LAW DIVISION

MONMOUTH COUNTY

DOCKET NO: L-002932-23

CIVIL ACTION

**NOTICE OF BANKRUPTCY  
FILING AND IMPOSITION OF  
AUTOMATIC STAY**

**PLEASE TAKE NOTICE THAT**, on December 8, 2023 (the “Petition Date”), Near North America, Inc., Near Intelligence LLC (successor entity of Near Intelligence Holdings, Inc.), and Near Intelligence, Inc. (collectively, “Near”) filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code in the United State Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”). Copies of the voluntary petitions (excluding the attachments thereto) are attached hereto as Exhibit A. Near’s case is proposed to be captioned In re Near Intelligence Inc., Case No. 23-11962.

**PLEASE TAKE FURTHER NOTICE THAT**, upon the filing of Near’s chapter 11 case, the automatic stay imposed by section 362 of the Bankruptcy Code (the “Automatic Stay”) became immediately effective and, as a result, all claims asserted in the above-captioned action (this “Proceeding”) are stayed absent an order of the Bankruptcy Court lifting or modifying the Automatic Stay.

**PLEASE TAKE FURTHER NOTICE THAT** information regarding the status of Near’s chapter 11 case may be obtained by (a) reviewing the docket of the Near chapter 11 case at <http://ecf.deb.uscourts.gov> (PACER login and password required) or free of charge at <https://cases.ra.kroll.com/Near>; or (b) contacting any of the following counsel for Near:

Sanjay P. Ibrahim, Esq. – 024942000  
Scott W. Parker, Esq. – 044461999  
Mark S. Winter, Esq. – 033271996  
**PARKER IBRAHIM & BERG LLP**  
270 Davidson Avenue, 5<sup>th</sup> Floor  
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[scott.parker@piblaw.com](mailto:scott.parker@piblaw.com)  
[mark.winter@piblaw.com](mailto:mark.winter@piblaw.com)

Dated: December 11, 2023

**PARKER IBRAHIM & BERG LLP**

/s/ Sanjay Ibrahim  
By: Sanjay P. Ibrahim, Esq.  
Scott W. Parker, Esq.  
*Attorneys for Defendants,*  
Near North America, Inc., Near  
Intelligence LLC (successor entity of  
Near Intelligence Holdings, Inc.), and  
Near Intelligence, Inc.



**EXHIBIT A**

Fill in this information to identify your case:	
United States Bankruptcy Court for the:	
DISTRICT OF DELAWARE	
Case number (if known)	23- Chapter 11

☐ Check if this an amended filing

Official Form 201

Voluntary Petition for Non-Individuals Filing for Bankruptcy

06/22

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1.	Debtor's name	Near Intelligence, Inc.	
2.	All other names debtor used in the last 8 years Include any assumed names, trade names and doing business as names	KludeIn I Acquisition Corp.	
3.	Debtor's federal Employer Identification Number (EIN)	85-3187857	
4.	Debtor's address	Principal place of business  100 W Walnut St., Suite A-4 Pasadena, CA 91124 Number, Street, City, State & ZIP Code  Los Angeles County	Mailing address, if different from principal place of business  P.O. Box, Number, Street, City, State & ZIP Code  Location of principal assets, if different from principal place of business  Number, Street, City, State & ZIP Code
5.	Debtor's website (URL)	www.near.com	
6.	Type of debtor	<input checked="" type="checkbox"/> Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP)) <input type="checkbox"/> Partnership (excluding LLP) <input type="checkbox"/> Other. Specify:	

Case number (if known)

Near Intelligence, Inc.

23-

Name

## 7. Describe debtor's business A. Check one:

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
- ☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
- ☐ Railroad (as defined in 11 U.S.C. § 101(44))
- ☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
- ☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
- ☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
- ☒ None of the above

## B. Check all that apply

- ☐ Tax-exempt entity (as described in 26 U.S.C. §501)
- ☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. §80a-3)
- ☐ Investment advisor (as defined in 15 U.S.C. §80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

5415

## 8. Under which chapter of the Bankruptcy Code is the debtor filing?

A debtor who is a "small business debtor" must check the first sub-box. A debtor as defined in § 1182(1) who elects to proceed under subchapter V of chapter 11 (whether or not the debtor is a "small business debtor") must check the second sub-box.

## Check one:

- ☐ Chapter 7
- ☐ Chapter 9
- ☒ Chapter 11. Check **all** that apply:

- ☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D), and its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$3,024,725. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- ☐ The debtor is a debtor as defined in 11 U.S.C. § 1182(1), its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$7,500,000, **and it chooses to proceed under Subchapter V of Chapter 11**. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return, or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- ☒ A plan is being filed with this petition.
- ☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
- ☒ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
- ☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12

## 9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?

If more than 2 cases, attach a separate list.

- ☒ No.
- ☐ Yes.

District	_____	When	_____	Case number	_____
District	_____	When	_____	Case number	_____

## 10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?

List all cases. If more than 1, attach a separate list

- ☐ No
- ☒ Yes.

Debtor	<u>See Attachment A</u>	Relationship	<u>Affiliate</u>
District	<u>Delaware</u>	When	<u>12/08/2023</u>
		Case number, if known	<u>23-</u>



Case number (if known)

Near Intelligence, Inc.

23-

Name

**11. Why is the case filed in this district?**

Check all that apply:

- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☐ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

**12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?**☒ No☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.**Why does the property need immediate attention?** (Check all that apply.)☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.

What is the hazard? \_\_\_\_\_

☐ It needs to be physically secured or protected from the weather.☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).☐ Other \_\_\_\_\_**Where is the property?** \_\_\_\_\_

Number, Street, City, State &amp; ZIP Code

**Is the property insured?**☐ No☐ Yes. Insurance agency \_\_\_\_\_

Contact name \_\_\_\_\_

Phone \_\_\_\_\_

**Statistical and administrative information****13. Debtor's estimation of available funds**

Check one:

- ☒ Funds will be available for distribution to unsecured creditors.
- ☐ After any administrative expenses are paid, no funds will be available to unsecured creditors.

**14. Estimated number of creditors**☐ 1-49☐ 50-99☐ 100-199☒ 200-999☐ 1,000-5,000☐ 5001-10,000☐ 10,001-25,000☐ 25,001-50,000☐ 50,001-100,000☐ More than 100,000**15. Estimated Assets**☐ \$0 - \$50,000☐ \$50,001 - \$100,000☐ \$100,001 - \$500,000☐ \$500,001 - \$1 million☐ \$1,000,001 - \$10 million☐ \$10,000,001 - \$50 million☒ \$50,000,001 - \$100 million☐ \$100,000,001 - \$500 million☐ \$500,000,001 - \$1 billion☐ \$1,000,000,001 - \$10 billion☐ \$10,000,000,001 - \$50 billion☐ More than \$50 billion**16. Estimated liabilities**☐ \$0 - \$50,000☐ \$50,001 - \$100,000☐ \$100,001 - \$500,000☐ \$500,001 - \$1 million☐ \$1,000,001 - \$10 million☐ \$10,000,001 - \$50 million☐ \$50,000,001 - \$100 million☒ \$100,000,001 - \$500 million☐ \$500,000,001 - \$1 billion☐ \$1,000,000,001 - \$10 billion☐ \$10,000,000,001 - \$50 billion☐ More than \$50 billion

\*Information provided on a consolidated basis, and based on the Debtors Books and Records as of the date hereof

Near Intelligence, Inc.

Name

Case number (if known)

23-

**Request for Relief, Declaration, and Signatures**

**WARNING --** Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

**17. Declaration and signature  
of authorized  
representative of debtor**

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 12/08/2023

MM / DD / YYYY

**X** /s/ John Faieta

Signature of authorized representative of debtor

John Faieta

Printed name

Title Chief Financial Officer

**18. Signature of attorney**

**X** /s/ Edmon L. Morton

Signature of attorney for debtor

Date 12/08/2023

MM / DD / YYYY

Edmon L. Morton

Printed name

Young Conaway Stargatt & Taylor, LLP

Firm name

1000 N. King Street Wilmington DE, 19801

Number, Street, City, State & ZIP Code

Contact phone (302) 571-6600

Email address emorton@ycst.com

3856 Delaware

Bar number and State

**Fill in this information to identify your case:**

United States Bankruptcy Court for the:

DISTRICT OF DELAWARE

Case number (if known) 23- Chapter 11☐ Check if this an amended filing**Official Form 201****Voluntary Petition for Non-Individuals Filing for Bankruptcy**

06/22

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

<b>1. Debtor's name</b>	<u>Near Intelligence LLC</u>	
<hr/>		
<b>2. All other names debtor used in the last 8 years</b> <small>Include any assumed names, trade names and <i>doing business as</i> names</small>	<u>Paas Merger Sub 2 LLC; Near Intelligence Holdings Inc.</u>	
<hr/>		
<b>3. Debtor's federal Employer Identification Number (EIN)</b>	<u>85-3187857</u>	
<hr/>		
<b>4. Debtor's address</b>	<b>Principal place of business</b>	<b>Mailing address, if different from principal place of business</b>
	<u>100 W Walnut St., Suite A-4 Pasadena, CA 91124</u> <small>Number, Street, City, State &amp; ZIP Code</small>	<hr/>
	<u>Los Angeles</u> <small>County</small>	<b>Location of principal assets, if different from principal place of business</b>
		<hr/> <small>Number, Street, City, State &amp; ZIP Code</small>
<hr/>		
<b>5. Debtor's website (URL)</b>	<u>www.near.com</u>	
<hr/>		
<b>6. Type of debtor</b>	<input checked="" type="checkbox"/> Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP)) <input type="checkbox"/> Partnership (excluding LLP) <input type="checkbox"/> Other. Specify: _____	
<hr/>		

Near Intelligence LLC

Case number (if known)

23-

Name

## 7. Describe debtor's business

A. Check one:

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
- ☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
- ☐ Railroad (as defined in 11 U.S.C. § 101(44))
- ☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
- ☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
- ☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
- ☒ None of the above

B. Check all that apply

- ☐ Tax-exempt entity (as described in 26 U.S.C. §501)
- ☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. §80a-3)
- ☐ Investment advisor (as defined in 15 U.S.C. §80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

5415

## 8. Under which chapter of the Bankruptcy Code is the debtor filing?

Check one:

- ☐ Chapter 7
- ☐ Chapter 9
- ☒ Chapter 11. Check **all** that apply:

A debtor who is a "small business debtor" must check the first sub-box. A debtor as defined in § 1182(1) who elects to proceed under subchapter V of chapter 11 (whether or not the debtor is a "small business debtor") must check the second sub-box.

- ☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D), and its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$3,024,725. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- ☐ The debtor is a debtor as defined in 11 U.S.C. § 1182(1), its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$7,500,000, **and it chooses to proceed under Subchapter V of Chapter 11**. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return, or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- ☒ A plan is being filed with this petition.
- ☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
- ☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
- ☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12

## 9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?

- ☒ No.
- ☐ Yes.

If more than 2 cases, attach a separate list.

District	_____	When	_____	Case number	_____
District	_____	When	_____	Case number	_____

## 10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?

- ☐ No
- ☒ Yes.

List all cases. If more than 1, attach a separate list

Debtor	<u>See Attachment A</u>	Relationship	<u>Affiliate</u>
District	<u>Delaware</u>	When	<u>12/08/2023</u>
		Case number, if known	<u>23 -</u>

Case number (if known)

Near Intelligence LLC

23-

Name

**11. Why is the case filed in this district?**

Check all that apply:

- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☒ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

**12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?**☒ No☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.**Why does the property need immediate attention?** (Check all that apply.)☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.

What is the hazard? \_\_\_\_\_

☐ It needs to be physically secured or protected from the weather.☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).☐ Other \_\_\_\_\_**Where is the property?** \_\_\_\_\_

Number, Street, City, State &amp; ZIP Code

**Is the property insured?**☐ No☐ Yes. Insurance agency \_\_\_\_\_

Contact name \_\_\_\_\_

Phone \_\_\_\_\_

**Statistical and administrative information****13. Debtor's estimation of available funds**

Check one:

- ☒ Funds will be available for distribution to unsecured creditors.
- ☐ After any administrative expenses are paid, no funds will be available to unsecured creditors.

**14. Estimated number of creditors**☐ 1-49☐ 50-99☐ 100-199☒ 200-999☐ 1,000-5,000☐ 5001-10,000☐ 10,001-25,000☐ 25,001-50,000☐ 50,001-100,000☐ More than 100,000**15. Estimated Assets**☐ \$0 - \$50,000☐ \$50,001 - \$100,000☐ \$100,001 - \$500,000☐ \$500,001 - \$1 million☐ \$1,000,001 - \$10 million☐ \$10,000,001 - \$50 million☒ \$50,000,001 - \$100 million☐ \$100,000,001 - \$500 million☐ \$500,000,001 - \$1 billion☐ \$1,000,000,001 - \$10 billion☐ \$10,000,000,001 - \$50 billion☐ More than \$50 billion**16. Estimated liabilities**☐ \$0 - \$50,000☐ \$50,001 - \$100,000☐ \$100,001 - \$500,000☐ \$500,001 - \$1 million☐ \$1,000,001 - \$10 million☐ \$10,000,001 - \$50 million☐ \$50,000,001 - \$100 million☒ \$100,000,001 - \$500 million☐ \$500,000,001 - \$1 billion☐ \$1,000,000,001 - \$10 billion☐ \$10,000,000,001 - \$50 billion☐ More than \$50 billion

\*Information provided on a consolidated basis, and based on the Debtors Books and Records as of the date hereof

Near Intelligence LLC

Name

Case number (if known)

23-

## Request for Relief, Declaration, and Signatures

**WARNING --** Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

**17. Declaration and signature  
of authorized  
representative of debtor**

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 12/08/2023

MM / DD / YYYY

**X** /s/ John Faieta

Signature of authorized representative of debtor

John Faieta

Printed name

Title Chief Financial Officer

**18. Signature of attorney**

**X** /s/ Edmon L. Morton

Signature of attorney for debtor

Date 12/08/2023

MM / DD / YYYY

Edmon L. Morton

Printed name

Young Conaway Stargatt & Taylor, LLP

Firm name

1000 N. King Street Wilmington, DE 19801

Number, Street, City, State & ZIP Code

Contact phone (302) 571-6600

Email address emorton@ycst.com

3856 Delaware

Bar number and State

Fill in this information to identify your case:

United States Bankruptcy Court for the:

DISTRICT OF DELAWARE

Case number (if known) 23- Chapter 11

☐ Check if this an amended filing

Official Form 201

Voluntary Petition for Non-Individuals Filing for Bankruptcy

06/22

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name	<u>Near North America, Inc.</u>	
2. All other names debtor used in the last 8 years Include any assumed names, trade names and doing business as names	<u>UberMedia, Inc.</u>	
3. Debtor's federal Employer Identification Number (EIN)	<u>27-2139078</u>	
4. Debtor's address	Principal place of business  <u>100 W Walnut St.</u> <u>Suite A-4</u> <u>Pasadena, CA 91124</u> Number, Street, City, State & ZIP Code  <u>Los Angeles</u> County	Mailing address, if different from principal place of business  _____ P.O. Box, Number, Street, City, State & ZIP Code  Location of principal assets, if different from principal place of business  _____ Number, Street, City, State & ZIP Code
5. Debtor's website (URL)	<u>www.near.com</u>	
6. Type of debtor	<input checked="" type="checkbox"/> Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP)) <input type="checkbox"/> Partnership (excluding LLP) <input type="checkbox"/> Other. Specify: _____	

**Near North America, Inc.**Case number (if known) **23-**

Name

**7. Describe debtor's business**

A. Check one:

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
- ☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
- ☐ Railroad (as defined in 11 U.S.C. § 101(44))
- ☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
- ☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
- ☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
- ☒ None of the above

B. Check all that apply

- ☐ Tax-exempt entity (as described in 26 U.S.C. §501)
- ☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. §80a-3)
- ☐ Investment advisor (as defined in 15 U.S.C. §80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

**5415****8. Under which chapter of the Bankruptcy Code is the debtor filing?**

Check one:

- ☐ Chapter 7
- ☐ Chapter 9
- ☒ Chapter 11. Check **all** that apply:

A debtor who is a "small business debtor" must check the first sub-box. A debtor as defined in § 1182(1) who elects to proceed under subchapter V of chapter 11 (whether or not the debtor is a "small business debtor") must check the second sub-box.

- ☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D), and its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$3,024,725. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- ☐ The debtor is a debtor as defined in 11 U.S.C. § 1182(1), its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$7,500,000, **and it chooses to proceed under Subchapter V of Chapter 11**. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return, or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- ☒ A plan is being filed with this petition.
- ☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
- ☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
- ☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12**9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?**

- ☒ No.
- ☐ Yes.

If more than 2 cases, attach a separate list.

District	_____	When	_____	Case number	_____
District	_____	When	_____	Case number	_____

**10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?**

- ☐ No
- ☒ Yes.

List all cases. If more than 1, attach a separate list

Debtor	<b>See Attachment A</b>	Relationship	<b>Affiliate</b>
District	<b>Delaware</b>	When	<b>12/08/2023</b>
		Case number, if known	<b>23-</b>



Near North America, Inc.

Case number (if known) 23-

Name

**11. Why is the case filed in this district?**

Check all that apply:

- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☒ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

**12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?**☒ No☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.**Why does the property need immediate attention?** (Check all that apply.)☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.

What is the hazard? \_\_\_\_\_

☐ It needs to be physically secured or protected from the weather.☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).☐ Other \_\_\_\_\_**Where is the property?** \_\_\_\_\_

Number, Street, City, State &amp; ZIP Code

**Is the property insured?**☐ No☐ Yes. Insurance agency \_\_\_\_\_

Contact name \_\_\_\_\_

Phone \_\_\_\_\_

**Statistical and administrative information****13. Debtor's estimation of available funds**

Check one:

- ☒ Funds will be available for distribution to unsecured creditors.
- ☐ After any administrative expenses are paid, no funds will be available to unsecured creditors.

**14. Estimated number of creditors**☐ 1-49☐ 50-99☐ 100-199☒ 200-999☐ 1,000-5,000☐ 5001-10,000☐ 10,001-25,000☐ 25,001-50,000☐ 50,001-100,000☐ More than 100,000**15. Estimated Assets**☐ \$0 - \$50,000☐ \$50,001 - \$100,000☐ \$100,001 - \$500,000☐ \$500,001 - \$1 million☐ \$1,000,001 - \$10 million☐ \$10,000,001 - \$50 million☒ \$50,000,001 - \$100 million☐ \$100,000,001 - \$500 million☐ \$500,000,001 - \$1 billion☐ \$1,000,000,001 - \$10 billion☐ \$10,000,000,001 - \$50 billion☐ More than \$50 billion**16. Estimated liabilities**☐ \$0 - \$50,000☐ \$50,001 - \$100,000☐ \$100,001 - \$500,000☐ \$500,001 - \$1 million☐ \$1,000,001 - \$10 million☐ \$10,000,001 - \$50 million☐ \$50,000,001 - \$100 million☒ \$100,000,001 - \$500 million☐ \$500,000,001 - \$1 billion☐ \$1,000,000,001 - \$10 billion☐ \$10,000,000,001 - \$50 billion☐ More than \$50 billion

\*Information provided on a consolidated basis, and based on the Debtors Books and Records as of the date hereof

**Near North America, Inc.**

Name

Case number (if known) **23-****Request for Relief, Declaration, and Signatures****WARNING --** Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.**17. Declaration and signature  
of authorized  
representative of debtor**

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on **12/08/2023**

MM / DD / YYYY

**X** **/s/ John Faieta**

Signature of authorized representative of debtor

**John Faieta**

Printed name

Title **Chief Financial Officer****18. Signature of attorney****X** **/s/ Edmon L. Morton**

Signature of attorney for debtor

Date **12/08/2023**

MM / DD / YYYY

**Edmon L. Morton**

Printed name

**Young Conaway Stargatt & Taylor, LLP**

Firm name

**1000 N. King Street Wilmington DE, 19801**

Number, Street, City, State &amp; ZIP Code

Contact phone **(302) 571-6600**Email address **emorton@ycst.com****3856 Delaware**

Bar number and State



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*Attorneys for Defendants,*  
Near North America, Inc., Near Intelligence LLC  
(successor entity of Near Intelligence Holdings, Inc.),  
and Near Intelligence, Inc.

BRIAN NASH,

Plaintiff,

v.

NEAR NORTH AMERICA, INC., NEAR  
INTELLIGENCE HOLDINGS, INC., NEAR  
INTELLIGENCE, INC., LAURENT  
CASTAILAC, GLADYS KONG and ANIL  
MATTEWS,

Defendants.

SUPERIOR COURT OF NEW JERSEY

LAW DIVISION

MONMOUTH COUNTY

DOCKET NO: L-002932-23

CIVIL ACTION

**CERTIFICATION OF SERVICE**

I, Mark S. Winter, Esq., hereby certify as follows:

1. I am an attorney-at-law admitted to practice in the State of New Jersey and am an associate of the law firm of Parker Ibrahim & Berg LLP, attorneys for Defendants Near North America, Inc., Near Intelligence LLC (successor entity of Near Intelligence Holdings, Inc.), and Near Intelligence, Inc. (“Defendants”), in the above-captioned matter.

2. On December 11, 2023, I caused to be sent a copy of Defendants' Notice of Bankruptcy Filing and Imposition of Automatic Stay, with accompanying exhibit, and this Certification of Service, as follows:

**VIA eCOURTS and FIRST CLASS MAIL**

Michael F. O'Connor, Esq.  
McMoran, O'Connor Bramley & Burns, PC  
2399 Highway 34  
Building D, Suite D-1  
Manasquan, New Jersey 07736  
*Attorneys for Plaintiff*  
Brian Nash

3. I certify the foregoing statements made by me are true and correct. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Respectfully submitted,

**PARKER IBRAHIM & BERG LLP**

*Attorneys for Defendants,*  
Near North America, Inc., Near Intelligence  
LLC (successor entity of Near Intelligence  
Holdings, Inc.), and Near Intelligence, Inc.

/s/ Mark S. Winter

Mark S. Winter

Date: December 11, 2023